



Integrated Permit System

Air Permit Streamlining Stakeholder Meeting

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Current System

- Apply for construction permit
- Receive construction permit
- Construct and demonstrate compliance
- Request revision to operation permit
- Receive revised operation permit



Current Permitting Problem Areas

- Conflicting requirements in construction and operation permits – transition language issues
- Certifying compliance on construction projects
- Duplicative work
- Inconsistency in compliance demonstration requirements



Proposed Integrated System

- Construction Permit and Revision of Operation Permit **applied for** by facility and **drafted by** DNR at same time
 - Reduces duplicative work for applicant and for DNR
 - For most permits, single permit writer
 - Eliminate inconsistencies between permits



Proposed Integrated System

- Revised Operation Permit **issued** concurrently or shortly after construction permit
 - Includes construction permit terms and conditions, operation permit terms and conditions and transition language
 - Eliminates conflicting permit conditions and compliance demonstration requirements



Permit Revision Processes

- Recent Rule Changes
 - Administrative Revisions
 - Minor Revisions
- Significant Revisions – no change



Administrative Revisions

- Construction permit and revised operation permit issued concurrently
- Timetable for issuance determined by the administrative revision
- Facility may begin construction AND operation immediately upon issuance of permits



Minor Revisions

- Facility may operate under requested revision conditions prior to permit revision approval if :
 - Operation does not conflict with existing permit conditions
 - adding a new unit, modifying a unit but not changing the applicable requirements
 - At own risk



Significant Revisions

- Issue construction permit
- Then, issue significant revision
- Facility may begin operation only after revised operation permit is issued (some exceptions)



Choice of revision process

- Depends on:
 - Part 70 or non Part 70 source
 - Type of construction project (exempt, minor or major)
 - Desire to start construction quickly
 - Desire to start operation quickly
 - Risk comfort level



Today's Presentations

- Walk through an example of how each revision process would work
- Present two ways that we could structure the revised permit to include: construction permit conditions, transitional language, revised operation permit conditions